

ADDENDUM
to the
**INITIAL STUDY AND MITIGATED NEGATIVE
DECLARATION**
for the
**LAS POSADAS FOREST FIRE STATION REPLACEMENT
PROJECT**



Prepared by the
California Department of Forestry and Fire Protection
in accordance with the
California Environmental Quality Act
APRIL 2015

ADDENDUM

LAS POSADAS FOREST FIRE STATION REPLACEMENT PROJECT

Lead Agency: California Department of Forestry and Fire Protection (CAL FIRE)

Type of CEQA Document: Addendum to Mitigated Negative Declaration and Initial Study previously approved by the Lead Agency (State Clearinghouse Number 2010112039). The Addendum has been prepared pursuant to State California Environmental Quality Act (CEQA) Guidelines, CCR 15000 *et seq.*, Title 14, Chapter 3, Article 11, Section 15164. A Notice of Determination was filed on January 4, 2011 with the State Clearinghouse to document the approval of the project.

Background: In February 2011, CAL FIRE approved an Initial Study/Mitigated Negative Declaration (IS/MND) that was prepared for the proposed Fawn Lodge Forest Fire Station Replacement Project. The 2011 IS/MND had assumed that construction would commence within a couple of years.

The proposed project was not completed within the anticipated time frame identified in the 2011 IS/MND due to a lack of funding. Following approval of the project CAL FIRE had to postpone the replacement of several fire station projects due to the inability to secure funding during the economic downturn in the state of California.

During the interim period minor revisions were made to update project details. These revisions are considered in this Addendum. In addition, it is prudent to confirm that the site conditions and applicable regulations have not changed significantly during the passage of time that could render the previously approved IS/MND deficient.

The approved 2011 IS/MND determined that the proposed project would have no significant adverse effects on the environment. Findings from this CEQA document include:

1. The proposed project would have no effect related to, land use and planning, mineral resources, population and housing, and recreation.
2. The proposed project would have a less than significant impact on aesthetics, agricultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, public services, transportation and traffic, and utilities and service systems.
3. The proposed project, as mitigated, would not have significant impacts related to air quality, biological resources, and cultural resources.

Scope of the Original Project: The 2011 IS/MND evaluated the environmental impacts of the demolition of a gas-house, a hose-rack, and a radio antenna on the existing project site and the construction of a new one-engine station on a 1.4-acre site 200 feet south of the current facility. The existing fire station will retain the barracks-messhall, apparatus building, gas and oil house, and tank house.

The new buildings, structures and improvements proposed on the adjacent property in the 2011 IS/MND consisted of:

- Barracks-Messhall – 8-bed, 3,383 square feet
- Apparatus Building – Two-bay, 1,700 square feet
- Generator-Pump-Storage building – 565 square feet
- Above-ground fuel vault
- New pump and rehabilitation of the existing well (unless necessary to drill new well)
- New septic and leach field system
- Grading, paving and sidewalks
- Underground routed utilities
- New water storage tank or tanks
- New hose wash rack
- Site lighting
- Site fencing
- New footing for a new radio tower
- Landscaping, irrigation and drainage
- Water system

Most of the project elements remain unchanged. Only minor revisions in square footage have occurred as a result of the engineering updates to the buildings. Those changes are listed as follows:

- Barracks-Messhall – 3,134 square feet. A decrease of 249 square feet.
- Apparatus Building – Two-bay 1,708 square feet. An increase of 8 square feet.
- Combination Building – 474 square feet. A decrease of 91 feet.
- Storage Building – 186 square feet. An increase of 186 square feet.

The storage was removed from the previous generator building and is now a separate building. The actual square footage of all the buildings has decreased by 146 square feet. The site plan remains relatively unchanged (except for the changes in square footage).

Reason for CEQA Addendum: As noted, subsequent to certification of the 2011 IS/MND the proposed project changed slightly and was suspended due to lack of funding. It has been four years since the environmental analysis was conducted. A reevaluation of the site conditions and applicable laws and regulations is necessary to ensure that no substantial changes have occurred that would change the determinations made in the original 2011 IS/MND.

ENVIRONMENTAL ANALYSIS

Aesthetics

The previous IS/MND prepared in 2011 determined that no significant impacts would occur as a result of the project. The new fire station will be constructed just south of the existing fire station. The new construction will be set back and tree removal will only occur where necessary to construct the facility. Native vegetation will be left in place surrounding the buildings and accessory structures. The new structures will be somewhat screened by several trees that are located in the front of the property adjacent to the roadway. The design and square footage of the buildings and accessory structures have not substantially changed since the original IS/MND determination. No significant impacts would occur to aesthetics.

Agriculture and Forest Resources

The 2011 IS/MND analysis determined that no impacts would occur as a result of the proposed project. There have been no changes that have occurred which would result in a different determination. No significant impacts would occur to agricultural resources.

Air Quality

The minor revisions in square feet would not result in new construction impacts on air quality. The project is a replacement project and does not expand capacity of the existing use. No other changes have occurred that would result in new or increased significant impacts with regard to air quality for construction or operation.

The 2011 IS/MND identified one mitigation measure that shall be implemented during construction to ensure that construction-related activities do not have a significant impact on air quality. This mitigation measure is still applicable, will be implemented accordingly and is as follows:

Mitigation Measure #1: Measures to Reduce Short-Term Construction Generated Emissions

Reasonable precautions shall be taken to prevent particulate matter from becoming airborne, including, but not limited to, the following when necessary:

- Water all active construction areas at least twice daily.
- Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard.
- Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas and staging areas at construction sites.
- Sweep daily (with water sweepers) all paved access roads, parking areas and staging areas at construction sites, and also sweep adjacent public streets if visible soil material is carried onto such streets during construction.
- All construction equipment shall be maintained in proper tune according to manufacturers' specifications to ensure minimum emissions under normal operations.

No other mitigation measures are required and impacts to air quality will remain less than significant.

Biological Resources

The 2011 IS/MND identified plant and animal species that have the possibility to occur within the project area (California Natural Diversity Database and California Rare Plant Rank). Additionally, staff from California Fish and Wildlife and CAL FIRE conducted surveys of the area to determine potential occurrence of the species identified. Seven plant species and ten animal species were identified to potentially occur on the proposed project site. The minor revisions to the project will not create any additional impacts. All previous mitigation measures are still applicable and will be implemented. These measures are as follows:

Mitigation Measure 2: Measures to Protect Special Status Plant Species:

In addition to the onsite and vicinity surveys already conducted, a CAL FIRE wildlife biologist, botanist, forester, or other qualified person will conduct a survey at the appropriate time of year (e.g. flowering or readily identifiable vegetative state) to determine the presence or absence of special status plant species prior to the commencement of construction. Special status plant populations detected within the project area will be avoided at the time of project implementation. If protection through avoidance is not feasible, CAL FIRE shall consult with the California Department of Fish and Wildlife and/or appropriate federal agency.

Mitigation Measure 3: Measures to Protect American Badger

Identify and avoid burrow systems that appear actively used (presence of tracks or scat) and are accessed with an opening of approximately 6 inches or greater in diameter. A CAL FIRE wildlife biologist or other qualified person will survey project area prior to ground disturbing activities. CAL FIRE shall consult with the California Department of Fish and Wildlife should any active burrow system exhibiting these characteristics be identified.

Mitigation Measure 4: Measures to Protect Ringtail

Retain all trees exhibiting cavities or snags/down logs greater than 11 inches DBH that are not a hazard within the project area or require removal to facilitate construction.

Mitigation Measure 5: Measures to Protect Bat Species

All trees suitable for use by bats within the project area shall be surveyed for signs of bats by a Department biologist, forester, or other qualified person no earlier than two to three days prior to tree removal or construction activities. If bats are discovered during the surveys then a buffer of 100 to 150 feet shall be established. The optimal time to remove trees is September 15 through October 15, when young would be capable of flying and February 15 to April 1 to avoid hibernating bats and prior to formation of maternity sites.

Mitigation Measure 6: Measures to Protect Northwestern Pond Turtle

Prior to tree or brush removal, a CAL FIRE wildlife biologist, forester, or other qualified person will conduct a visual survey for nest site scrapes or overwintering sites. Any identified nest site will be protected through avoidance. If protection by avoidance is not feasible, CAL FIRE shall consult with the California Department of Fish and Wildlife to develop appropriate strategy for protection, which may include scheduling project activities after hatching or possibly relocating overwintering adults to similar habitat within the project vicinity. See Holland (1994) for examples of these sites.

Mitigation Measure 7: Measures to Protect Long-eared Owl

A CAL FIRE wildlife biologist, forester, or other qualified person will conduct a three visit visual survey for occupied nest sites adjacent to the proposed project footprint and for a 500-

foot radius distance. Surveys are to be equivalently spaced across the March through May period. Consultation with the California Department of Fish and Wildlife is required if an occupied nest site is identified to develop site specific measures to avoid disturbance.

Mitigation Measure 8: Measures to Protect Northern Spotted Owl

A CAL FIRE wildlife biologist, forester, or other qualified person will conduct surveys to recognized U.S. Fish and Wildlife Service protocols to determine presence/absence of this species within and adjacent to the project area. If a NSO activity center is discovered prior to or during construction, within 1000 feet of the project area, consultation with appropriate federal agency to develop site specific measures to avoid take of this federal threatened species will occur.

Mitigation Measure #9: Measures to Protect Migratory Bird Species

Nest sites of migrant bird species or raptors occupying the project site will be avoided to protect project year nest site production and achieve compliance with Migratory Bird Treaty Act and California Fish and Game Code Section 3503, 3513, and 3800 requirements. If tree removal and other vegetation clearing will occur between February 1 and September 1, a preconstruction nesting survey shall be conducted in advance of the activity by an ornithologist, wildlife biologist, forester, or other qualified person under the following conditions:

1. Surveys for birds will be conducted no earlier than 14 days prior to tree removal and/or breaking ground,
2. In the event that nesting birds are found, CAL FIRE will consult with California Department of Fish and Wildlife and obtain approval for nest-protection buffers prior to tree removal and/or ground-breaking activities, and
3. Nest protection buffers will remain in effect until the young have fledged.

Mitigation Measure #10: Measures to Protect Oak and other Mature Trees

Trees to be retained will be protected through the use of barricades during the construction phase. The CAL FIRE Unit Forester has determined that the project site is timberland as defined in PRC 4526 and the removal of trees constitutes timber operations as defined in PRC 4527. This project would convert timberland to other uses and will require the submittal of a conversion exemption/waiver to CAL FIRE pursuant to Section 1104.1(a) of the Forest Practice Rules. Implementation of Mitigation Measure #11 would reduce the effect to less than significant.

Mitigation Measure #11: Timberland Conversion

Within three to six months prior to the commencement of the construction project, the Las Posadas State Forest Manager (or another registered professional forester designated by CAL FIRE) will file a Conversion Exemption and waiver pursuant to Section 1104.1(a) of the Forest Practice Rules. Timber removal will be completed by a Licensed Timber Operator, and the tree removal will be carried out in conformance with all applicable Forest Practice Rules.

Cultural Resources

During the preparation of the 2011 IS/MND for this proposed project, the entire project area was subjected to intensive cultural resource investigations by professional archaeologists working for CAL FIRE (2010) and through an archaeological services contract with California State University Bakersfield (2007) and California State University Stanislaus

(2009). These studies were conducted in accordance with *Archaeological Review Procedures for CAL FIRE Projects* (Foster 2003). The work included a current archaeological records check, pre-field research, consultation with the Native American Heritage Commission and local Native American tribal groups listed on CAL FIRE's Native American Contact List for Napa County, and an intensive on-the-ground field survey.

CAL FIRE determined that the project would not have a significant impact on cultural resources with the implementation of two mitigation measures. No additional impacts will occur as a result of the minor revisions to the project and the following mitigation measures will be implemented according to the approved 2011 IS/MND.

Mitigation Measure #12: Immediately Halt Construction if Cultural Resources are Discovered

Concentrations of prehistoric or historic artifacts or other significant cultural resources are not likely to be encountered during construction, since the known historic site will be protected by avoidance. It is possible, however, that buried cultural resources could be unearthed during construction, and without this mitigation measure, such inadvertent discovery could lead to a significant impact if the construction was not halted pending an evaluation. If cultural resources are encountered during construction, all work shall be immediately halted in that immediate area until a CAL FIRE archaeologist can be brought-in to evaluate the discovery. Examples of prehistoric artifacts to be alert for include stone flakes or flake tools made from chert or obsidian, stream cobbles, and items of shell or bone. Historic items may include bottle fragments, fragments of porcelain, nails, cans, buttons, or other items. The archaeologist shall develop appropriate management recommendations. These recommendations shall be carried out prior to re-initiating any construction activities in the area where the discovery took place.

Mitigation Measure #13: Procedures if Human Remains are Inadvertently Discovered

In accordance with the California Health and Safety Code, if human remains are discovered during ground disturbing activities, CAL FIRE and/or the project contractor(s) shall immediately halt potentially damaging excavation in the area of the human remains and notify the Napa County Coroner and a qualified professional archaeologist to determine the nature and significance of the remains. The coroner is required to examine all discoveries of human remains with 48 hours of receiving notice of a discovery on private or state lands (Health and Safety Code Section 7050(c)). Following the coroner's findings, the archaeologist and the Most Likely Descendent (designated by the Native American Heritage Commission) shall determine the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human interments are not disturbed. The responsibilities of Napa County and CAL FIRE to act upon notification of a discovery of Native American human remains are identified in the California Public Resources Code Section 5097.

Geology and Soils

The construction of the Las Posadas Fire station would not result in significant new impacts during construction or operations related to seismicity, geology, or soils. The 2011 IS/MND did not identify any potential significant impacts that required mitigation. This determination remains unchanged, and there will be no significant impacts as a result of the proposed project.

Greenhouse Gas (GHG) Emissions

The 2011 IS/MND contained a substantial greenhouse gas emissions analysis for the proposed project. Staff has confirmed that the conversion factors have not changed substantially to warrant a new analysis. The changed factors are as follows:

Diesel Fuel Conversion Factor: Increased from 10.15 to 10.21

Gasoline Conversion Factor: Decreased from 8.81 to 8.78

Source: Environmental Protection Agency emission factors for GHG (2014)

The 2011 IS/MND indicated that the total greenhouse gas generated by the project was 557.87 metric tons of CO₂e over the entire 50-year life span of the station. Construction generated emissions totaled 241.22 metric tons of CO₂e. This would result in an average of 11.16 metric tons of CO₂e per year over 50 years.

There are no accepted standard thresholds that can be used to determine significance, although the U.S. Environmental Protection Agency requires reporting of GHG from sources that in general emit 25,000 metric tons or more of carbon dioxide equivalent per year. Napa County is within the Bay Area Air Quality Management District (BAAQMD) boundaries and in June 2010 CEQA significance thresholds of 1,100 metric tons per year were adopted for GHG emissions. In March 2012 the Alameda County Superior Court issued a judgement finding that BAAQMD had failed to comply with CEQA when it adopted the thresholds. The court did not make a determination about the validity of the thresholds, but rather the adoption of the thresholds should have been analyzed as a project under CEQA. Although currently, the BAAQMD does not implement these thresholds it provides an indication as to what would be considered significant in the region.

The fire station is estimated to emit 11.16 metric tons of GHGs per year, well under the 1,100 metric tons per year threshold that BAAQMD had considered significant. The proposed project will not increase operational capacity. The operational emissions will likely be improved as the current facilities will be replaced with modern, energy-efficient buildings that would be built to current standards and codes for heating, ventilation, and air-conditioning equipment. The prior IS/MND determination that the project would have a less than significant impact is still applicable. No significant impacts to greenhouse gas emissions would occur as a result of the proposed project.

Hazards and Hazardous Materials

There will be no changes with regard to hazards or hazardous materials impacts for construction or operational activities. Therefore, no new or greater significant hazardous materials impacts would occur. All impacts remain less than significant.

Hydrology and Water Quality

The 2011 IS/MND determined that the project would not create any significant impacts with implementation of one mitigation measure identifying permit requirements under the San Francisco Bay Regional Water Quality Control Board. CAL FIRE will implement the following mitigation measure. The circumstances and determination of the prior IS/MND has not changed and no new or additional significant impacts will occur.

Mitigation Measure 14: Measures to Prevent Storm Water Pollution

Construction at the site would be subject to requirements of the National Pollutant Discharge Elimination System construction storm-water Permit, which would be developed by qualified personnel in consultation with the San Francisco Bay Regional Water Quality Control Board and implemented prior to any construction activities. CAL FIRE and/or its representatives and contractors shall be responsible for securing the General Construction Activity Storm Water Permit and preparation and use of a Storm Water Pollution Prevention Plan submitted to the regional water quality control board prior to the initiation of any ground-disturbing construction activities. CAL FIRE or its contractors would assure that all sediment and erosion control measures specified in this permit are implemented for the duration of the project. A copy of this permit would be retained on the construction site; copies would be provided to all contractors and other parties that would be responsible for implementing the permit's best management practices for water quality. Any necessary storm water quality sampling and reporting associated with the storm water permit shall be the primary responsibility of the project contractor, and shall be performed by qualified personnel in a timely fashion.

Land Use and Planning

The proposed project would not result in incompatible land uses. The existing land uses in the vicinity of the proposed site have not changed since 2011. In addition, the project is an allowed use on the project site. The proposed replacement project would remain compatible with the existing and new surrounding uses.

Mineral Resources

The prior determination that no mineral resources will be impacted as a result of the proposed project is still valid. No additional or new significant impacts will occur.

Noise

The project will not create new or additional significant impacts with regard to noise generated during construction or operations. Although construction of the project will increase noise levels, there are no nearby sensitive receptors. Construction will occur during daytime hours of operation and will be for a short period of time. The project is replacing an existing fire station adjacent to an existing fire station and will not change the operational noise levels. No mitigation measures were identified in the 2011 IS/MND as no potentially significant impacts will occur.

Population and Housing

The project circumstances have not changed, and the slight revisions to the square footage of the buildings will not change the no impact determination made in the 2011 IS/MND. The fire station will be replaced and will retain the same capacity (8 beds). No impacts will occur to population and housing, and no mitigation measures are required.

Public Services

No new significant impacts or changes to the prior impact determinations will occur. No impact will occur to police protection, schools, parks or other facilities that would necessitate new or physically altered government facilities and no mitigation measures are required.

Recreation

The no impact determination in the 2011 IS/MND remains unchanged for impacts to recreation. No new or additional significant impacts will occur, and no mitigation measures are necessary.

Transportation and Traffic

The 2011 IS/MND concluded that no significant impacts would occur as a result of the proposed project. The site conditions and determination have not changed with regard to transportation and traffic impacts during construction or operation of the proposed project. No new impacts will occur, and no mitigation measures are required.

Utilities and Service Systems

There are no changes to construction or operational impacts with regard to utilities and service systems. The 2011 IS/MND determinations are valid, and all impacts will remain less than significant. No mitigation measures are required.

Mandatory Findings of Significance

The prior determinations with regard to Mandatory Findings of Significance remain valid. All impacts remain less than significant, and no new impacts or changes in impacts will occur.

DETERMINATION

CAL FIRE has prepared this addendum to the IS/MND per 14 CCR § 15164(b). It documents that none of the conditions described in PRC § 21166 or 14 CCR § 15162 calling for preparation of a subsequent IS/MND have occurred. CAL FIRE has chosen not to prepare a subsequent IS/MND for the following reasons:

1. It will not result in substantial changes to the project that will require major revisions of the IS/MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. It will not result in substantial changes with respect to the circumstances under which the project is undertaken that will require major revisions of the IS/MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. It does not constitute new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the IS/MND was certified as complete, and none of the following is applicable:
 - A. The project will have one or more significant effects not discussed in the IS/MND.
 - B. Significant effects previously examined will be substantially more severe than shown in the IS/MND.
 - C. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative.
 - D. Mitigation measures which are considerably different from those analyzed in the previous IS/MND would substantially reduce one or more significant effects on

the environment, but the project proponents decline to adopt the mitigation measure or alternative.

- E. It does not constitute new information, which was not known and could not have been known at the time the environmental impact report was certified as complete.

Based on the information contained in this addendum, the square footage revisions and current site conditions would not result in an increase in environmental impacts over what was previously analyzed. The current site conditions, or modified project, would not result in a substantial change in the conclusions and analysis included in the IS/MND. In addition, all mitigation measures identified in the prior IS/MND are still applicable and will be implemented accordingly.

Figure 1. Project Location

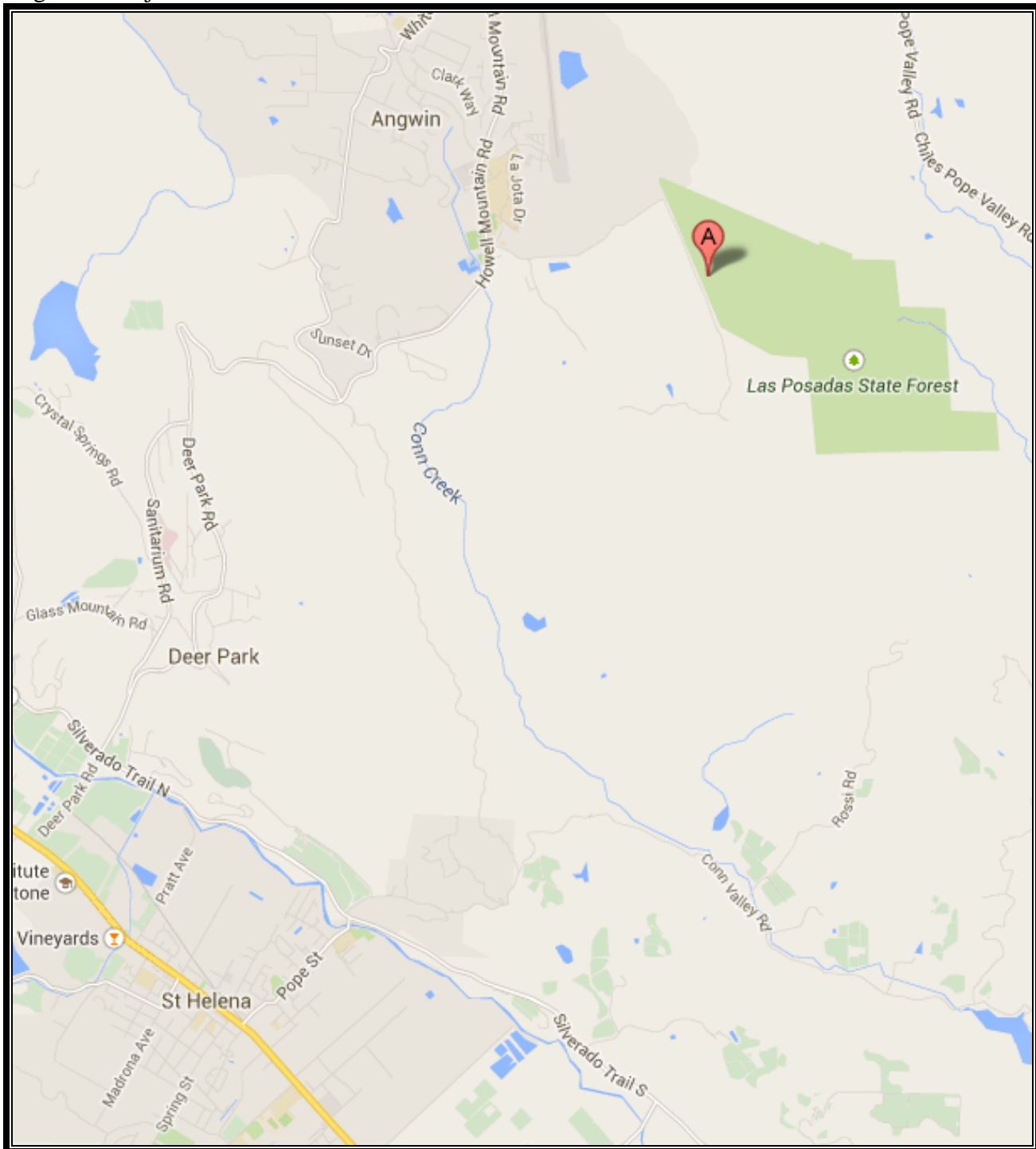


Figure 2. Site Plan.

